

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND; STATE OF  
NEW YORK; STATE OF HAWAI'I; STATE  
OF ARIZONA; STATE OF CALIFORNIA;  
STATE OF COLORADO; STATE OF  
CONNECTICUT; STATE OF DELAWARE;  
STATE OF ILLINOIS; STATE OF MAINE;  
STATE OF MARYLAND;  
COMMONWEALTH OF MASSACHUSETTS;  
PEOPLE OF THE STATE OF MICHIGAN;  
STATE OF MINNESOTA; STATE OF  
NEVADA; STATE OF NEW JERSEY; STATE  
OF NEW MEXICO; STATE OF OREGON;  
STATE OF VERMONT; STATE OF  
WASHINGTON; STATE OF WISCONSIN;

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States; INSTITUTE OF  
MUSEUM AND LIBRARY SERVICES;  
KEITH E. SONDERLING, in his official  
capacity as Acting Director of the Institute of  
Museum and Library Services; MINORITY  
BUSINESS AND DEVELOPMENT AGENCY;  
MADIHA D. LATIF, in her official capacity as  
Deputy Under Secretary of Commerce for  
Minority Business Development; HOWARD  
LUTNICK, in his official capacity as Secretary  
of Commerce; FEDERAL MEDIATION AND  
CONCILIATION SERVICE; GREGORY  
GOLDSTEIN, in his official capacity as Acting  
Director of the Federal Mediation and  
Conciliation Service; OFFICE OF  
MANAGEMENT AND BUDGET; RUSSELL  
T. VOUGHT, in his official capacity as Director  
of the Office of Management and Budget;

Defendants.

Case No.: 1:25-cv-128

**NOTICE OF PLAINTIFFS' PROPOSED PRELIMINARY INJUNCTION ORDER**

Plaintiffs respectfully submit the Proposed Preliminary Injunction Order attached hereto as Exhibit A pursuant to this Court's instruction that Plaintiffs shall prepare and submit to the Court a preliminary injunction form order, after consultation with the Defendants. Plaintiffs' counsel communicated and consulted with Defendants' counsel regarding a proposed order. The attached Proposed Preliminary Injunction Order incorporates feedback received from Defendants' counsel, but the parties were ultimately unable to reach complete agreement on the content.

Respectfully submitted,

[signatures begin on next page]

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**CERTIFICATE OF SERVICE**

I certify that on May 9, 2025, I electronically filed the foregoing document and that it is available for viewing and downloading from the Court's CM/ECF system, and that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system

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